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June 7, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: In re: Insulin Pricing Litigation, No. 2:23-md-03080-BRM-RLS
Parties' Submission on the Status of Plaintiff Fact Sheets**

Dear Judge Singh:

Pursuant to the Court's May 31, 2024 Order directing the parties to submit a joint status letter regarding the parties' meet-and-confers about proposed Plaintiff Fact Sheet (PFS) and document requests to the Court [ECF 189], the parties provide the following status update.

Following the meet-and-confer on May 22, 2024, on May 30, 2024, counsel for the State Attorney General Track provided a draft Plaintiff Fact Sheet for the State Attorney General Track. Defendants reviewed Plaintiffs' proposal. On June 7, 2024, Defendants informed the State Attorney General Track that, after considering the State Attorney General Track's proposal, Defendants do not believe plaintiff fact sheets are appropriate or necessary for the State Attorney General track. Rather, Defendants believe the most efficient way forward with the State Attorney General Track is to exchange discovery requests, as the Defendants are doing with the Third-Party Payor Track. The parties are scheduling a meet-and-confer next week to discuss an orderly process forward for discovery in the State Attorney General Track. The parties propose to submit a joint status on this process on June 21, 2024.

Defendants and Plaintiffs in the Self-Funded Payer Track continue to discuss the contents of an appropriate plaintiff fact sheet. Plaintiffs sent a markup of Defendants' proposed document requests on May 28, 2024. Defendants have since drafted a proposed plaintiff fact sheet for the Self Funded Payer Track that they are discussing among their defense groups and their clients. Defendants intend to provide that draft to Plaintiff early next week.

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We thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi
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Third-Party Payer Class Track

/s/ David R. Buchanan
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